

Exhibit B
Declaration of Nurse Linda Stewart

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

ANTONIO MARTINEZ,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:06-CV-257-MHT
)	
NURSE STEWART, et. al.,)	
)	
Defendants.)	

DECLARATION OF LINDA STEWART
PURSUANT TO 28 U.S.C. § 1746

STATE OF ALABAMA)
)
COUNTY OF LEE)

1. My name is Linda Stewart. I am over the age of nineteen and competent to make this declaration.

2. I have been employed as a nurse with the Lee County Detention Facility for over four years. I am an L.P.N. and have been licensed for over twenty-years, having served as a nurse in the ICU and CCU in Cobb Hospital Emergency Room for fifteen-years. I taught Nursing Assistance Clinicals for two years at Career Institute. I collected medical information for the law firm of Bellamy and Jones for three years, and I was employed as the personal nurse for Doctor Hoffman, in Phenix City, Alabama, for twelve years, prior to my coming to the Lee County Detention Facility.

3. I am familiar with the Plaintiff Antonio Martinez due to his incarceration in the Lee County Detention Facility.

4. I state affirmatively that I neither acted, nor caused anyone to act, in such a manner as to deprive the Plaintiff of any right to which he was entitled.

5. It is the policy of the Lee County Sheriff's Office that all inmates confined in the Lee County Detention Center are entitled to a level of health care comparable to that available to citizens in the surrounding community which will ensure their physical and emotion well-being.

6. Medical care rendered to inmates in the Lee County Detention Center is delivered under the direction of a licensed health care provider.

7. No health care personnel or Detention Center officer or other employee of the Sheriff's Office will ever summarily or arbitrarily deny an inmate's reasonable request for medical services.

8. Medical, dental, and mental health matters involving clinical judgments are the sole province of the responsible physician, dentist, or psychiatrist or qualified psychologist, respectively.

9. Inmates will be guaranteed access to all diagnostic, laboratory, or other treatment services as directed by the responsible health care authority.

10. It is the policy of the Lee County Sheriff's Office to allow inmates incarcerated in the Lee County Detention Center to request health care services at any time.

11. Two methods may be utilized by inmates incarcerated in the Lee County Detention Center in order to secure health care services:

- a. Verbal Request: An inmate may make a verbal request for emergency medical attention to any member of the Detention Center staff at any time.
- b. Written Request: An inmate in need of any type of medical attention may complete an Inmate Request form seeking medical attention and forward it to any member of the Detention Center staff.

12. Requests for medical treatment will be accepted by members of the Detention Center staff at any time.

13. When a request for medical treatment is made to a member of the Detention Center

staff, the staff member receiving the request will notify the Shift Supervisor of the inmate's request. It is the Shift Supervisor's responsibility to ensure that the inmate's request is attended to in a prompt and proper manner. Any doubt as to whether an actual need exists for medical treatment shall be resolved in favor of the inmate and medical treatment will be offered.

14. Medical requests of an emergency nature are to be handled immediately.

15. As part of the booking process, inmates are informed of the methods by which they may maintain medical treatment during the booking process.

16. The Detention Center nurses, under the direction of the Detention Center Administrator, are charged with the responsibility of obtaining appointments for inmates with physicians in order that they may receive medical treatment or for scheduling times when the treating physician may attend to health care needs at the Detention Center.

17. All health care rendered to inmates will, at the doctor's discretion, be given privately to the inmate, outside the presence of a Detention Center official. Should the physician request, a Detention Center officer will be present for any and all examinations the treating physician deems appropriate.

18. Sick call is conducted on a scheduled basis by a licensed practical nurse and is available to all inmates. All inmates are required to pay a fee for non-emergency treatment. Inmates will not be denied medical treatment. When an inmate has insufficient funds in his/her trust account to pay for the assessed fee(s), a lien in the amount of the fee(s) will be placed on the inmate's trust account against future monies which may be received.

19. I followed Dr. McFarland's orders with regard to the Plaintiff's medical care. In fact, per the policy of the Lee County Sheriff's Office, I always follow the instructions of Dr. McFarland on all medical issues.

20. On January 10, 2006, the Plaintiff submitted a request to see me or the doctor concerning his hernia, and therefore I examined him and set him up an appointment to see Dr. McFarland. (See Exhibit 1, Inmate Medical File of Antonio Martinez, "Medical File," Inmate Request Slip dated January 10, 2006; Exhibit 2, Medical File, Notes dated January 13, 2006.) The Plaintiff stated that he needed surgery and that he was "under [my] care now." (Ex. 2.) I noted that he needed to see Dr. McFarland to have his hernia put back in and placed him in medical observation. (Ex. 2.) I also ordered Motrin twice a day for the Plaintiff. (Ex. 2; Exhibit 3, Medical File, Medication Administration Record dated January 13, 2006.)

21. The Plaintiff saw Dr. McFarland the next day. (Exhibit 4, Medical File, Notes dated January 18, 2006.) Dr. McFarland noted that the Plaintiff had had a left inguinal hernia for one year. The Plaintiff stated that he had spent two days in the hospital in Atlanta with the hernia, but he did not have surgery. Dr. McFarland noted that the hernia was easily reduced, that the testicle had no hydrocele, that his abdomen was soft and nontender with normal bowel sounds, and that the Plaintiff was not having any respiratory distress. (Ex. 4.)

22. Dr. McFarland noted that the Plaintiff did not need to have surgery at that time. (Ex. 4.) Dr. McFarland noted that, if the hernia was not able to be reduced or if he had any vomiting, surgery would be needed. Otherwise, any surgery would be merely elective. Dr. McFarland did not prescribe any medication or treatment for the Plaintiff. (Ex. 4.)

23. On January 24, 2006, the Plaintiff requested medication. (Exhibit 5, Medical File, Inmate Request Slip dated January 24, 2006.) I noted that Dr. McFarland did not prescribe pain medication but did give the Plaintiff Motrin. (Ex. 5.)

24. On January 25, 2006, the Plaintiff again requested pain medication. (Exhibit 6, Medical File, Inmate Request Slip dated January 25, 2006.) I noted that he had a follow-up appointment scheduled with Dr. McFarland. (Ex. 6.)

25. On January 26, 2006, the Plaintiff was caught by Corporal Wiltsie lifting a water bag in an attempt to try to make his hernia come out. Corporal Wiltsie reported this situation to me, and I relayed it to Dr. McFarland. (Exhibit 7, Inmate File, Notes dated January 31, 2006.)

26. Dr. McFarland examined the Plaintiff on January 31, 2006. (Ex. 7.) Dr. McFarland noted that there were no nodules within the testicles, no redness, and no swelling. He also noted that the Plaintiff's abdomen was benign. Dr. McFarland further noted that the Plaintiff's claimed tenderness seemed to be "dramatic" rather than "true tenderness." (Ex. 7.)

27. Dr. McFarland stated that the hernia was not "a problem requiring any attention at this time" and that "nothing need[ed] to be done about the hernia at this time." (Ex. 7.) Dr. McFarland did state that the Plaintiff could use over-the-counter antifungal medication for a fungal infection on his right foot. (Ex. 7.)

28. The Plaintiff sent another request form regarding his hernia and asking for fungus cream. (Exhibit 8, Medical File, Inmate Request Slip dated February 6, 2006.) I responded that Dr. McFarland was aware of the hernia and if it comes out he may see the doctor. I also gave him cream for his foot. (Ex. 8.)

29. The Plaintiff then sent another request form asking for medication for his feet and hernia. (Exhibit 9, Medical File, Inmate Request Slip dated February 28, 2006.) I again gave the Plaintiff Motrin and anti-fungal cream. (Ex. 9.)

30. On March 8, 2006, the Plaintiff sent a request to see the doctor. (Exhibit 10, Medical File, Inmate Request Slip dated March 8, 2006.) Nurse Griffith examined the Plaintiff on March 10, 2006. (Ex. 10; Exhibit 11, Notes dated March 10, 2006.) Nurse Griffith noted that there was no swelling, pouch, or indentation. (Ex. 11.) Nurse Griffith gave the Plaintiff Motrin and set him up to see Dr. McFarland. (Ex. 11.)

31. On March 14, 2006, Dr. McFarland examined the Plaintiff. (Exhibit 12, Medical File, Notes dated March 14, 2006.) Dr. McFarland placed the hernia back in and noted that the testicles were nontender. (Ex. 12.) He noted that the hernia can be manually reduced without difficulty and that surgery was not needed. (Ex. 12.) Dr. McFarland did not order or recommend any medication or treatment for the Plaintiff. (Ex. 12.)

32. On March 31, April 6, April 9, and April 10, 2006, the Plaintiff requested pain medication and was given Tylenol or Motrin. (Exhibit 13, Medical File, Request dated March 31, 2006; Exhibit 14, Medical File, Inmate Request Slip dated April 6, 2006; Exhibit 15, Medical File, Inmate Request Slip dated April 9, 2006; Exhibit 16, Medical File, Inmate Request Slip dated April 10, 2006.)

33. On April 14, 2006, the Plaintiff submitted a request for Motrin. (Exhibit 17, Medical File, Inmate Request Slip dated April 14, 2006.) Nurse Griffith responded to the Plaintiff that he could obtain Tylenol or Motrin from whoever was passing out medications because he was authorized on the medication books to receive either. (Ex. 17.)

34. On April 18, 2006, the Plaintiff requested medication and to see the doctor. (Exhibit 18, Medical File, Inmate Request Slip dated April 18, 2006.) Nurse Stewart ensured that the Plaintiff received Motrin and that he was set up to see Dr. McFarland. (Ex. 18.)

35. On April 25, 2006, Dr. McFarland saw the Plaintiff and noted that the Plaintiff's hernia was still stable. (Exhibit 19, Medical File, Notes dated April 25, 2006.)

36. Dr. McFarland has never recommended that the Plaintiff have surgery or have any pain medication other than Tylenol or Motrin. Further, Dr. McFarland did not recommend that the Plaintiff remain in medical isolation. Had Dr. McFarland recommended a surgery for the Plaintiff, I would have taken the steps to set this surgery up for the Plaintiff. Had Dr. McFarland recommended that the Plaintiff receive any other type of pain medication, I would have given the

Plaintiff that medication. Had Dr. McFarland recommended that the Plaintiff remain in medical isolation, I would have followed that recommendation.

37. I have never received a written grievance from the Plaintiff concerning the allegations made the basis of his Complaint.

38. All medical records attached to the Special Report are true and accurate copies of medical documents kept in the Plaintiff's medical file by me in the ordinary course of my business. I am the custodian of these records.

39. I declare under penalty of perjury that the foregoing is true and correct. I further declare that I am competent to make this declaration, and that the above statements were made by drawing from my personal knowledge.

Executed on this the 5 day of May, 2006.

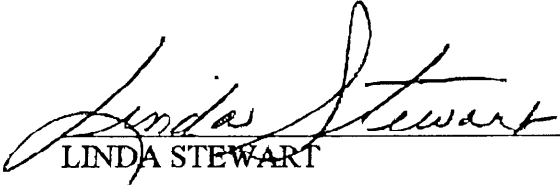

LINDA STEWART

Exhibit 1
Medical File of Antonio Martinez
Inmate Request Slip dated January 10, 2006

Lee County Detention Center
INMATE REQUEST SLIP

Name Antonio Martinez Date 1-10-06 ^{F-1}
LOCATION

☐ Telephone Call ☐ Doctor ☐ Dentist ☐ Time Sheet
☐ Special Visit ☐ Personal Problem ☐ Other

Briefly Outline Your Request. Give To Jailer

Need to see nurse or doctor
Have hernia THATS swollen up
the size of an orange.

Thank You

Do Not Write Below This Line - For Reply Only

1/13/06 you will see
me

NURS. Stowers

Approved _____ Denied _____ Collect Call _____

All Request Will Be Routed Through The Sergeant Over The Jail, Then Forwarded To Those The Request is Directed.

☐ Lieutenant ☐ Chief Deputy ☐ Sheriff

Date _____ Time Received _____

CORRECTION OFFICER _____

Exhibit 2
Medical File of Antonio Martinez
Notes dated January 13, 2006

NOTES

NAME: Martinez, Antonio SS# [REDACTED]DOB: [REDACTED] AGE: 48 SEX: M RACE: HDRUG ALLERGIES: Ø TETNUS: _____NATURE OF PROBLEM OR REQUEST: Lt Inguinal Hernia

I CONSENT TO BE TREATED BY HEALTH STAFF FOR THE CONDITION DESCRIBED.

SIGNATURE _____

HEALTH CARE DOCUMENTATION

SUBJECTIVE:

OBJECTIVE: BP _____ P _____ R _____ T _____ O2 _____ASSESSMENT: Alert I/m Brought to Clinic

C/O. Needing Surg "U'm under your care now" askd estimate how long the 'bop' hernia would not answer ask how long it's been going in / out would not answer ask WHO's your m would not answer. the I/m person "When do I have my Surg?" enjoining him need to see an m TO put himself back in. I/m respond "you will get A phone call"

PLAN:

Moved I/m to medical observation, mother did Ø lying out. may see m w/p.

REFER TO: PA/PHYSICIAN MENTAL HEALTH _____ DENTAL _____SIGNATURE [Signature] TITLE Yr DATE 1/13/11 TIME 1400

Exhibit 3
Medical File of Antonio Martinez
Medication Administration Record
Dated January 13, 2006

STOCK #506423

ARTING FOR		THROUGH			
Physician		Telephone No.		Medical Record No.	
Physician		Alt. Telephone			
ergies		Renabilitative Potential			
gnosis					
Medicaid Number		Medicare Number		Approved By Doctor:	
				By: <i>Stewart</i> Title: <i>Gen</i>	
RESIDENT		D.O.B.		Sex	
<i>Martina Austin</i>				Room	
				E-1	
				Patient Code	
				Admission Date	

Exhibit 4
Medical File of Antonio Martinez
Notes dated January 18, 2006

NOTES

NAME: Martinez, Antonio SS# [REDACTED]
 DOB: [REDACTED] AGE: 48 SEX: M RACE: H
 DRUG ALLERGIES: Ø TETNUS: _____
 NATURE OF PROBLEM OR REQUEST: Left Inguinal Hernia

I CONSENT TO BE TREATED BY HEALTH STAFF FOR THE CONDITION DESCRIBED.

SIGNATURE _____

HEALTH CARE DOCUMENTATION

SUBJECTIVE:

01/18/06 Lee County Detention Center Antonio Martinez #593038095

This 48 YO Hispanic male has a left inguinal hernia that has been present for one year. He said he even spent two days in the hospital in Atlanta with it. They did not do surgery. He said he was supposed to have had surgery two weeks ago when he was brought to the jail. He is not sure of the name of the doctor.

Physical Exam: He walks in loudly complaining. He walked out comfortable. When he lies down I see a large left inguinal hernia that is easily reduced although he resisted my reducing it. It is probably about 5 cm. The defect itself feels like it is probably 2 or 3 cm. The testicle has no hydrocele. He is generally tender in the area of his genitalia. His abdomen is soft and nontender with normal bowel sounds. He is not having any respiratory distress.

Impression: Left inguinal hernia that reduces easily.

Plan: I tried to explain the difference between an elective and an urgent surgical need. If he has any vomiting or if the hernia is not able to be reduced then we certainly should see him in the Emergency Room and reduce it and if it doesn't reduce then proceed to emergency surgery otherwise it continues to be an elective surgical need. He did not understand that that meant that it could be scheduled at a time that was convenient to his present circumstances. Recheck prn.

PLAN:

medication records re (L) inguinal hernia

Bring MHT Back.

REFER TO: _____ PA/PHYSICIAN _____ MENTAL HEALTH _____ DENTAL _____

SIGNATURE _____ TITLE MD DATE 1-18-06 TIME 0910

JOHN H MCFARLAND MD

AM8104894

AL11404

Exhibit 5
Medical File of Antonio Martinez
Inmate Request Slip dated January 24, 2006

Lee County Detention Center
INMATE REQUEST SLIP

Name ANTONIO MARTINEZ Date 1-24-06 ^{EEL}
 LOCATION

☐ Telephone Call ☐ Doctor ☐ Dentist ☐ Time Sheet
☐ Special Visit ☐ Personal Problem ☐ Other

Briefly Outline Your Request. Give To Jailer

Nurse Stewart

Could you give me my Medication
I really need to go to the hosp.
Im in alot of pain. for hernia

Do Not Write Below This Line - For Reply Only

1/24/06 am m. don't
order any pain meds
if motion given

Nurse Stewart

Approved _____ Denied _____ Collect Call _____

All Request Will Be Routed Through The Sergeant Over The Jail, Then Forwarded To Those The Request is Directed.

☐ Lieutenant ☐ Chief Deputy ☐ Sheriff

Date _____ Time Received _____

CORRECTION OFFICER _____

Exhibit 6
Medical File of Antonio Martinez
Inmate Request Slip dated January 25, 2006

Lee County Detention Center

INMATE REQUEST SLIPE=1
LOCATIONName Antonio Martinez Date 1/25/06☐ Telephone Call ☐ Doctor ☐ Dentist ☐ Time Sheet☐ Special Visit ☐ Personal Problem ☐ OtherBriefly Outline Your Request. Give To JailerNurse

Could you give me my Medication
I really need to go to the hosp.
Im in alot of pain from the
heria

Do Not Write Below This Line - For Reply Only

1/31/06 you have to follow
up with me on 2/8/06

Nurse Stewart

Approved _____ Denied _____ Collect Call _____

All Request Will Be Routed Through The Sergeant Over The Jail, Then Forwarded To Those The Request is Directed.

☐ Lieutenant☐ Chief Deputy☐ Sheriff

Date _____ Time Received _____

CORRECTION OFFICER _____

Exhibit 7
Medical File of Antonio Martinez
Notes dated January 31, 2006

NOTES

NAME: Martinez Antonio SS# [REDACTED]DOB: [REDACTED] AGE: 48 SEX: M RACE: HDRUG ALLERGIES: Ø TETNUS: NATURE OF PROBLEM OR REQUEST: Stramato Caught Left
Water Dog about 30-40 lbs

I CONSENT TO BE TREATED BY HEALTH STAFF FOR THE CONDITION DESCRIBED.

SIGNATURE

HEALTH CARE DOCUMENTATION

517
1654

SUBJECTIVE:

OBJECTIVE: BP _____ P _____ R _____ T _____ O2 _____

ASSESSMENT:

01/31/06 Lee County Detention Center Antonio Martinez #593038095

This 48 YO Hispanic male was lifting a 30-40 lb sack of water in an apparent attempt to get his left inguinal hernia to come back out. His hernia is back in. He says he is tender in the testicles.**Physical Exam:** I was able to palpate testicles. There are no nodules within them. It is not the epididymis. It is more tender, in fact it seems to be a dramatic type of tenderness rather than a true tenderness. There is no redness or swelling. His abdomen is benign.**Impression:** Inguinal hernia that is not out and certainly not incarcerated or a problem requiring any attention at this time.**Plan:** Nothing needs to be done about the hernia at this time.**Addendum:** He shows me a fungal infection in the four-five web space of the right foot. He can use some over-the-counter antifungal medication such as Tinactin, etc. Recheck prn.REFERTO: [Signature] PA/PHYSICIAN _____ MENTAL HEALTH _____ DENTAL _____SIGNATURE [Signature] TITLE MD DATE 1-31-06 TIME 09:12

JOHN H MCFARLAND MD

AM8104894

AL11404

Exhibit 8
Medical File of Antonio Martinez
Inmate Request Slip dated February 6, 2006

Lee County Detention Centre
INMATE REQUEST SLIP

C-1
LOCATION

Name ANTONIO MARTINEZ Date _____

☐ Telephone Call ☒ Doctor ☐ Dentist ☐ Time Sheet
☐ Special Visit ☒ Personal Problem ☐ Other

Briefly Outline Your Request. Give To Jailer

Excuse Mrs. Nurse, I am writing to you in
concern of my hypermia, I am in very serious
pain. I also need some fungus cream
for my feet.

Thanks, God Bless

Do Not Write Below This Line - For Reply Only

2/6/06 Day, Mr. or Mrs.
of your hypermia, is it
out you may see
on Mr. Case given

Nurse

Approved _____ Denied _____ Collect Call _____

All Request Will Be Routed Through The Sergeant Over The Jail, Then Forwarded To Those The Request is Directed.

☐ Lieutenant ☐ Chief Deputy ☐ Sheriff

Date _____ Time Received _____

CORRECTION OFFICER _____

Exhibit 9
Medical File of Antonio Martinez
Inmate Request Slip dated February 28, 2006

Lee County Detention Center
INMATE REQUEST SLIP

5-1
LOCATION

Name Antonio MARTINEZ Date _____

☐ Telephone Call ☐ Doctor ☐ Dentist ☐ Time Sheet
☐ Special Visit ☐ Personal Problem ☒ Other

Briefly Outline Your Request. Give To Jailer

I need med's for fungus
 on my feet the shower is
 so nasty it's pitiful
 also I need med Thanks
 for my Hernia I am in
 Bad pain / I need it soon!!
 Thanks

Do Not Write Below This Line - For Reply Only

2/28/00 it's better given
 also Anti Fungal Cream
 Self
 Nurse [Signature]

Approved _____ Denied _____ Collect Call _____

All Request Will Be Routed Through The Sergeant Over The Jail, Then Forwarded To Those The Request is Directed.

☐ Lieutenant

☐ Chief Deputy

☐ Sheriff

Date _____ Time Received _____

CORRECTION OFFICER _____

Exhibit 10
Medical File of Antonio Martinez
Inmate Request Slip dated March 8, 2006

Lee County Detention Center
INMATE REQUEST SLIP

F=1
LOCATION

Name ANTONIO MARTINEZ Date 3/8/06

☐ Telephone Call ☒ Doctor ☐ Dentist ☐ Time Sheet
☐ Special Visit ☐ Personal Problem ☐ Other

Briefly Outline Your Request. Give To Jailer

I AM HAVING A VERY HARD TIME GETTING UP & AND
 OUT OF BED. PERSON IS THIS HERNIA IS GIVE
 ME PAIN ALL THE TIME GIVE ME PROBLEM WHEN USE
 THE BATHROOM. THE PAIN PILL IS NOT GETTING OR TAKING
 THIS PAIN AWAY. NEED TO SEE THE DOCTOR SOON AS POSSIBLE

THANK YOU

Antonio Martinez

Do Not Write Below This Line - For Reply Only

Been today in sick
CALL 3/10/06

Nurse Griffith

Approved _____ Denied _____ Collect Call _____

All Request Will Be Routed Through The Sergeant Over The Jail, Then Forwarded To
 Those The Request is Directed.

☐ Lieutenant ☐ Chief Deputy ☐ Sheriff

Date _____ Time Received _____

CORRECTION OFFICER _____

Exhibit 11
Medical File of Antonio Martinez
Notes dated March 10, 2006

NOTES

NAME: Martinez, Antonio SS# [REDACTED]DOB: [REDACTED] AGE: 48 SEX: M RACE: HDRUG ALLERGIES: Ø TETNUS: _____NATURE OF PROBLEM OR REQUEST: states has pain from
inguinal hernia (L)

I CONSENT TO BE TREATED BY HEALTH STAFF FOR THE CONDITION DESCRIBED.

SIGNATURE

HEALTH CARE DOCUMENTATION

SUBJECTIVE: ATO K3. responsiveOBJECTIVE: BP _____ P _____ R _____ T _____ O2 _____ASSESSMENT: States has pain to (L) groin. States has
(L) inguinal hernia. No swelling or pouch noted.
do "hole" to (L) inguinal area. No induration
noted to area.PLAN: (1) to see M.D. next visit. (2) Motrin 400mg
PO now.REFER TO: PA/PHYSICIAN MENTAL HEALTH _____ DENTAL _____SIGNATURE [Signature] TITLE LOW DATE 3/10/06 TIME 2:30 pm

Exhibit 12
Medical File of Antonio Martinez
Notes dated March 14, 2006

NOTES

NAME: Martinez Antonio SS# [REDACTED]
 DOB: [REDACTED] AGE: 48 SEX: M RACE: H
 DRUG ALLERGIES: Q TETNUS: _____
 NATURE OF PROBLEM OR REQUEST: inguinal hernia

I CONSENT TO BE TREATED BY HEALTH STAFF FOR THE CONDITION DESCRIBED.

SIGNATURE _____

HEALTH CARE DOCUMENTATION

1657

SUBJECTIVE:

OBJECTIVE: BP _____ P _____ R _____ T _____ O2 _____

ASSESSMENT:

03/14/06 Lee County Detention Center Antonio Martinez #593038095

This 48 YO Hispanic male says his hernia is still coming out. It is uncomfortable. He is walking with his hand on this left groin.

Physical Exam: He doesn't want to let his stomach muscles relax but he eventually does and with slow gentle pressure over the left inguinal hernia it goes back in. the testicles are nontender. No other lesions.

Impression: Left inguinal hernia.

Plan: I talked to him again about the elective nature of having this repaired. He probably will want to have this done at some point. In the meantime, if he has it come out and can't get it back in and starts vomiting he will let the nurse know immediately so that we can evaluate and see if it will go back in or if it needs emergent evaluation and possible repair. In the meantime, it is an elective thing. It can be manually reduced without difficulty now.

PLAN:

(C) Inguinal hernia reduced to relief

REFER TO: _____ PA/PHYSICIAN _____ MENTAL HEALTH _____ DENTAL _____

SIGNATURE JOHN H MCFARLAND MD TITLE MD DATE 3-14-06 TIME 0927

AM8104894

AL 11404

04/19/06 C/O Hernia out
 To put it back in

Exhibit 13
Medical File of Antonio Martinez
Inmate Request Slip dated March 31, 2006

NURSE

I NEED SOME PAIN PILLS FOR
MY HERNIA BECAUSE IT REALLY HURTS.
THANKS FOR YOUR TIME

4/1/06
Tylenol sent
Nurse Giffard

Exhibit 14
Medical File of Antonio Martinez
Inmate Request Slip dated April 6, 2006

Lee County Detention Center
INMATE REQUEST SLIP

F-1
LOCATION

Name ANTONIO MARTINEZ Date 04-06-06

☐ Telephone Call ☐ Doctor ☐ Dentist ☐ Time Sheet
☐ Special Visit ☐ Personal Problem ☒ Other

Briefly Outline Your Request. Give To Jailer NURSE STEWART.
I WOULD LIKE TO HAVE MOTRIN FOR
MY HERNIA FOR A COUPLE OF DAYS LONGER
BECAUSE I'M IN CONSTANT PAIN.

THANKS FOR your Time

Do Not Write Below This Line - For Reply Only

4/7/06 Motrin sent

Nurse Grist

Approved _____ Denied _____ Collect Call _____

All Request Will Be Routed Through The Sergeant Over The Jail, Then Forwarded To Those The Request is Directed.

☐ Lieutenant ☐ Chief Deputy ☐ Sheriff

Date _____ Time Received _____

CORRECTION OFFICER _____

Exhibit 15
Medical File of Antonio Martinez
Inmate Request Slip dated April 9, 2006

Lee County Detention Center
INMATE REQUEST SLIP

F-1

LOCATIONName ANTONIO MARTINEZ Date 04-09-06

☐ Telephone Call ☐ Doctor ☐ Dentist ☐ Time Sheet
☐ Special Visit ☐ Personal Problem ☒ Other

Briefly Outline Your Request. Give To Jailer NURSE STEWART
I NEED SOME MOTRIN FOR MY HERNIA
BECAUSE I AM IN ALOT OF PAIN

Do Not Write Below This Line - For Reply Only

4/10/06 Motrin sent
Nurse Griffin

Approved _____ Denied _____ Collect Call _____

All Request Will Be Routed Through The Sergeant Over The Jail, Then Forwarded To Those The Request is Directed.

☐ Lieutenant ☐ Chief Deputy ☐ Sheriff

Date _____ Time Received _____

CORRECTION OFFICER _____

FORM: LCS-038 (6/99)

Exhibit 16
Medical File of Antonio Martinez
Inmate Request Slip dated April 10, 2006

Lee County Detention Center
INMATE REQUEST SLIP

5-1
LOCATION

Name ANTONIO MARTINEZ Date 4/10/06

☐ Telephone Call ☐ Doctor ☐ Dentist ☐ Time Sheet
☐ Special Visit ☐ Personal Problem ☐ Other

Briefly Outline Your Request. Give To Jailer

Nurse Stewart
could you give me my medication
for hernia IM in alot pain

Do Not Write Below This Line - For Reply Only

04/12/06 #11 meters given
for orders of our MD

Kyle Henry

Approved _____ Denied _____ Collect Call _____

All Request Will Be Routed Through The Sergeant Over The Jail, Then Forwarded To Those The Request is Directed.

☐ Lieutenant

☐ Chief Deputy

☐ Sheriff

Date _____ Time Received _____

CORRECTION OFFICER _____

Exhibit 17
Medical File of Antonio Martinez
Inmate Request Slip dated April 14, 2006

Lee County Detention Center
INMATE REQUEST SLIP

5-1
LOCATION

Name Antonio Martinez Date 04/14/06

☐ Telephone Call ☐ Doctor ☐ Dentist ☐ Time Sheet
☐ Special Visit ☐ Personal Problem ☐ Other

Briefly Outline Your Request. Give To Jailer

Nurse Stewart

I need some Motrin for my
Hernia Because I am in alot
of Pain

Do Not Write Below This Line - For Reply Only

4/15/06 you have an order from our
doctor to have Tylenol or Motrin. It
is fixed up in the medication books
for you. Just ask whoever is
passing out medication for it.
Nurse Griffith

Approved _____ Denied _____ Collect Call _____

All Request Will Be Routed Through The Sergeant Over The Jail, Then Forwarded To
Those The Request is Directed.

☐ Lieutenant ☐ Chief Deputy ☐ Sheriff

Date _____ Time Received _____

CORRECTION OFFICER

Exhibit 18
Medical File of Antonio Martinez
Inmate Request Slip dated April 18, 2006

Lee County Detention Center

INMATE REQUEST SLIP**LOCATION**Name ANTONIO MARTINEZ Date 4/18/06☐ Telephone Call ☐ Doctor ☐ Dentist ☐ Time Sheet☐ Special Visit ☐ Personal Problem ☐ Other

Briefly Outline Your Request. Give To Jailer

NURSE STEWART
I NEED MY MEDICATION
FOR MY HERNIA, AND I DID NOT GET
TO GO SEE THE DOCTOR TODAY.
WHAT'S THE HOLD-UP? I NEED TO
GO SEE HIM, IF ITS NOT A
PROBLEM.
THANK YOU FOR YOUR TIME.

Do Not Write Below This Line - For Reply Only

4/19/06 already addressed
Down TO See him
The. Occasional Tyl/Metric
got Two Ther Am

Approved _____ Denied _____ Collect Call _____

All Request Will Be Routed Through The Sergeant Over The Jail, Then Forwarded To Those The Request is Directed.

☐ Lieutenant ☐ Chief Deputy ☐ Sheriff

Date _____ Time Received _____

CORRECTION OFFICER _____

Exhibit 19
Medical File of Antonio Martinez
Notes dated April 25, 2006

NOTES

NAME: Martinez, Antonio SS# [REDACTED]
DOB: [REDACTED] AGE: 48 SEX: M RACE: H
DRUG ALLERGIES: None TETNUS: _____
NATURE OF PROBLEM OR REQUEST: put hernia back in

I CONSENT TO BE TREATED BY HEALTH STAFF FOR THE CONDITION DESCRIBED.

SIGNATURE _____

HEALTH CARE DOCUMENTATION

WT 180

SUBJECTIVE:

OBJECTIVE: BP _____ P _____ R _____ T _____ O2 _____

ASSESSMENT:

PLAN:

Stable @ ingested hernia.

REFER TO: _____ PA/PHYSICIAN _____ MENTAL HEALTH _____ DENTAL _____

SIGNATURE JOHN H MCFARLAND MD TITLE MD DATE 9-25-06 TIME 1625

AM8104894
AL11404